

FBT-CV15-6048103-S

DONNA L. SOTO, ADMINISTRATRIX OF THE	:	SUPERIOR COURT
ESTATE OF VICTORIA L. SOTO et al.	:	
	:	JUDICIAL DISTRICT OF
Plaintiffs,	:	FAIRFIELD
	:	
v.	:	AT BRIDGEPORT
	:	
BUSHMASTER FIREARMS INTERNATIONAL,	:	MAY 16, 2016
LLC, et al.	:	
Defendants.	:	

DEFENDANT CAMFOUR HOLDING, INC.'S OBJECTIONS TO PLAINTIFFS'
FIRST SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS

Defendant Camfour Holding, Inc. s/h/a Camfour Holding, LLP a/k/a Camfour Holding, Inc. ("Camfour Holding") hereby submits its objections to Plaintiffs' First Set of Requests for Production pursuant to Practice Book Section 13-10(b).

REQUESTS FOR PRODUCTION

1. Documents concerning contractual and/or business relationship(s) between or among the Company and Bushmaster Firearms International, LLC; and/or Freedom Group, Inc.; and/or Bushmaster Firearms; and/or Bushmaster Firearms, Inc.; and/or Bushmaster Holdings, LLC; and/or Remington Arms Co, LLC; and/or Remington Outdoor Company, Inc. [hereinafter collectively referred to as ("Remington")], from January 1, 2006 to the present day.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could

otherwise be obtained by plaintiffs.

2. Documents concerning contractual and/or business relationship(s) between or among the Company and Riverview Sales, Inc. from January 1, 2006 to the present day.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

3. Documents concerning any and all purchase orders, payments, rebates, and other exchanges of cash or goods between or among the Company and Bushmaster Firearms International, LLC; and/or Freedom Group, Inc.; and/or Bushmaster Firearms; and/or Bushmaster Firearms, Inc.; and/or Bushmaster Holdings, LLC; and/or Remington Arms Co, LLC; and/or Remington Outdoor Company, Inc., from January 1, 2006 to the present day.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

4. Documents concerning any and all purchase orders, payments, rebates, and/or other exchanges of cash or goods between or among the Company and Riverview Sales, Inc. from January 1, 2006 to the present day.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request

seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

5. Documents concerning communications between or among the Company and Bushmaster Firearms International, LLC; and/or Freedom Group, Inc.; and/or Bushmaster Firearms; and/or Bushmaster Firearms, Inc.; and/or Bushmaster Holdings, LLC; and/or Remington Arms Co, LLC; and/or Remington Outdoor Company, Inc., from January 1, 2006 to the present day.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

6. Documents concerning communications between or among the Company and Riverview Sales, Inc. from January 1, 2006 to the present day.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

7. Documents concerning the branding, marketing, or sale of AR-15 style assault rifles as modern sporting rifles during the period January 1, 2006 through December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a

holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

8. Documents concerning marketing, promotion, promotional strategies, the Company's customer base, the Company's desired customer base, and/or market research received, obtained or created by the Company concerning AR-15 style assault rifles, including but not limited to the Remington/Bushmaster model XM15-E2S, from January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

9. Documents, including web site postings, blog postings, and/or any other internet marketing created by or at the behest of the Company or any other defendant in this action concerning AR-15 style assault rifles, use of assault rifles for home defense, suitability of assault rifles as gifts or family guns and/or appropriate uses of assault rifles, prior to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

10. Documents concerning the use of video games to market and promote the sale of AR-15 style assault rifles, including, but not limited to the Remington/Bushmaster model XM15- E2S, from January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

11. Documents concerning the display of AR-15 style assault rifles in video games, including, but not limited to the Remington/Bushmaster model XM15-E2S, from January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

12. Documents concerning the function of the Remington/Bushmaster model XM15–E2S.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

13. Documents concerning the manner in which AR-15 style assault rifles, including but not limited to the Remington/Bushmaster model XM15-E2S, were used by non-military and non-law enforcement owners prior to December 14, 2012, including but not limited to documents concerning storage, sharing, transfer, gifting, transport and/or re-sale of assault rifles, and any and all other uses of assault rifles by such owners.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

14. Documents concerning training and/or instruction provided to or available to purchasers of AR-15 style assault rifles, including to purchasers of the Remington/Bushmaster model XM15-E2S, prior to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

15. Documents concerning the volume of sales of AR-15 style assault rifles, including but not limited to the Remington/Bushmaster model XM15-E2S, by the Company from January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and

cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

16. Documents concerning the volume of sales of AR-15 style assault rifles, including but not limited to the Remington/Bushmaster model XM15-E2S, in the industry from January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

17. Any statements, documents, and/or communications concerning the December 14, 2012 mass shooting at Sandy Hook Elementary School and/or concerning the events which are the subject of this Complaint.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

18. Documents concerning RIVERVIEW GUN SALES, INC. AKA RIVERVIEW GUN SALES store security, including surveillance procedures during the period of January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and

cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

19. Documents concerning the particular XM15-E2S sold to Nancy Lanza, and described in Exhibit A attached hereto at page 3, including but not limited to information concerning its distribution, manufacture, and/or sale.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

20. Documents concerning the sale of any firearms to Nancy Lanza or Adam Lanza, including, but not limited to, documents concerning regulatory compliance in connection with such sale.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

21. Documents concerning the federal firearms license held by David LaGuercia, including, but not limited to, information concerning compliance *vel non* by the licensee and/or RIVERVIEW GUN SALES, INC. AKA RIVERVIEW GUN SALES with applicable firearms laws from January 1, 2006 to December 14, 2012.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request

seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

22. Documents concerning any entries in the Company's Acquisition and Disposition Book pertaining to the particular XM15-E25 sold to Nancy Lanza and described in Exhibit A, attached hereto at page 3.

OBJECTIONS: Camfour Holding objects to this request on the basis that it is a holding company that is not involved in the purchase or sale of firearms and this request seeks the production of documents that are not in its possession, custody or control and cannot be provided by Camfour Holding with substantially greater facility than they could otherwise be obtained by plaintiffs.

Dated: White Plains, New York
May 16, 2016

Respectfully submitted,

By: /s/ Scott C. Allan (418493)
Christopher Renzulli
crenzulli@renzullilaw.com
Scott C. Allan
sallan@renzullilaw.com
RENZULLI LAW FIRM, LLP (425626)
81 Main Street, Suite 508
White Plains, New York 10601
Telephone: (914) 285-0700
Facsimile: (914) 285-1213

Attorneys for defendant Camfour Holding, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objections to Plaintiffs' First Set of Requests for Production of Documents was served on all counsel of record on May 16, 2016 by first class mail, U.S. postage prepaid to the following addresses:

Joshua D. Koskoff, Esq.
Alinor C. Sterling, Esq.
Katherine Mesner-Hage, Esq.
Koskoff Koskoff & Bieder, PC
350 Fairfield Avenue
Bridgeport, CT 06604

Attorneys for Plaintiffs

Peter M. Berry, Esq.
Berry Law LLC
107 Old Windsor Road, 2nd Floor
Bloomfield, CT 06002

Attorney for Defendants Riverview Sales, Inc.
and David LaGuercia

James B. Vogts, Esq.
Andrew A. Lothson, Esq.
Swanson, Martin & Bell, LLP
330 North Wabash, Suite 3300
Chicago, IL 60611

and

Jonathan P. Whitcomb, Esq.
Scott M. Harrington, Esq.
Diserio Martin O'Connor & Castiglioni LLP
One Atlantic Street
Stamford, CT 06901

Attorneys for Defendants Remington Arms
Company, LLC and Remington Outdoors
Company, Inc.

By: /s/ Scott C. Allan (418493)
Christopher Renzulli
crenzulli@renzullilaw.com
Scott C. Allan
sallan@renzullilaw.com
RENZULLI LAW FIRM, LLP (425626)
81 Main Street, Suite 508
White Plains, New York 10601
Telephone: (914) 285-0700
Facsimile: (914) 285-1213

Attorneys for defendants Camfour Holding, Inc.